

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

KRISTEN DELANEY, individually and as parent of A.D., minor child; SEAN DELANEY; CAULIN DELANEY; EDWARD HANLON; TRACEY HANLON, individually and as parent of T.H., minor child; STEPHEN MURPHY; LESLIE PEASE; MATTHEW PEASE; LAURA PEASE; AND MEREDITH PEASE, individually and on behalf of all others similarly situated,

Plaintiffs,

v.

THE 3M COMPANY, f/k/a Minnesota Mining and Manufacturing Co., AGC CHEMICALS AMERICAS INC., AMEREX CORPORATION, ARKEMA INC., ARCHROMA U.S. INC., BUCKEYE FIRE EQUIPMENT COMPANY, CARRIER GLOBAL CORPORATION, CHEMDESIGN PRODUCTS INC., CHEMGUARD INC. CHEMICALS, INC., CLARIANT CORPORATION, individually and as successor in interest to Sandoz Chemical Corporation, CORTEVA, INC., individually and as successor in interest to DuPont Chemical Solutions Enterprise, DEEPWATER CHEMICALS, INC., DUPONT DE NEMOURS INC., individually and as successor in interest to DuPont Chemical Solutions Enterprise, DYNAX CORPORATION, E. I. DUPONT DE NEMOURS AND COMPANY, individually and as successor in interest to DuPont Chemical Solutions Enterprise, KIDDE-FENWAL, INC., individually and as successor in interest to Kidde Fire Fighting, Inc., NATION FORD CHEMICAL COMPANY, THE CHEMOURS COMPANY, individually and as successor in interest to DuPont Chemical Solutions Enterprise, THE CHEMOURS COMPANY FC, LLC, individually and as successor in interest to DuPont Chemical Solutions Enterprise, and TYCO FIRE PRODUCTS, LP, individually and as successor in interest to The Ansul Company, and DOE DEFENDANTS 1-20, fictitious names whose present identities are unknown,

Defendants.

Civil Action No. 1:22-cv-09544

**STIPULATION AND ORDER  
EXTENDING TIME TO  
ANSWER**

**IT IS HEREBY STIPULATED** by and between the parties hereto and their undersigned counsel that if this action is transferred to the *In re Aqueous Film-Forming Foams Products Liability* multi-district litigation (“AFFF MDL”), then the deadline for Defendants to move, answer, or otherwise respond to the Summons and Complaint shall be in accordance with the established rules and procedures in the AFFF MDL. Should the Judicial Panel on Multidistrict Litigation decline to transfer this action to the AFFF MDL, Defendants shall have through and including the 28th day after such disposition by the Judicial Panel on Multidistrict Litigation to answer, move, or otherwise respond to the Complaint.

**By:** /s/ Andrew Croner

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*Attorneys for Defendants*

*Tyco Fire Products LP and*

*Chemguard, Inc.*

Dated: November 15, 2022

Dated: November 15, 2022

SO ORDERED:

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HON. LORNA G. SCHOFIELD, U.S.D.J.,